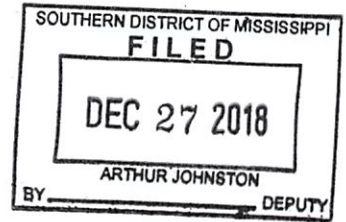


IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION



DOUGLAS HANDSHOE

PLAINTIFF

VS.

CIVIL ACTION NO. 1:15cv382HSO-JCG

VAUGHN PERRET, CHARLES LEARY &
DANIEL ABEL, D/B/A TROUT
POINT LODGE LTD OF NOVA SCOTIA
& IN THEIR INDIVIDUAL CAPACITIES
PROGRESS MEDIA GROUP LIMITED,
MARILYN SMULDERS, TORSTAR
CORPORATION, NATIONAL
GEOGRAPHIC SOCIETY, XYZ
FOUNDATION & JOHN DOES 1-50

DEFENDANTS

DEFENDANT CHARLES LEARY'S
PRO SE MOTION FOR SANCTIONS UNDER
THE MISSISSIPPI *LITIGATION ACCOUNTABILITY ACT* AND
THE COURT'S INHERENT AUTHORITY

COMES NOW Plaintiff by counterclaim **Charles Leary**, appearing *pro se*, and files this his Motion under this Honorable Court's inherent authority and Fed.R.Civ.P. 11 seeking sanctions against original Plaintiff Douglas Handshoe related to his complaints, his defense, and his opposition to a motion for additional discovery. A memorandum brief supporting this motion in detail is attached.

RESPECTFULLY SUBMITTED, this the 20th day of December, 2018.

CHARLES LEARY, DEFENDANT

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Canada

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CERTIFICATE OF SERVICE

I hereby certify that, on Dec 20th, 2018, I caused a true and correct copy of the above and foregoing to be filed utilizing the Court's CM/ECF electronic document filing system, which caused notice of such filing to be delivered to all counsel of record and parties requesting notice, and by United States First Class Mail, postage prepaid, to the following non-ECF participants having appeared in this action:

[none]



Charles L. Leary